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September 29, 1999

Via Telecopy

Fugene Bull, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Pre-MUR 377: MSBDFA Management Group, Inc.

Dear Mr. Bull:

Further to our discussions with respect to the above-referenced matter, attached is a chart reconciling the Commission's contribution records with the sources of funds for those contributions as best MSBDFA Management Group has been able to determine, along with a Declaration of the company's president, Stanley W. Tucker.

We will forward the signed original of the Declaration as soon as we receive it.

I trust this completes the information OGC needs to move forward with the conciliation process.

If you have any questions concerning the attached or need further information, please contact the undersigned.

Sincerely yours,

Joseph E. Sandler

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Paul Mark Sandler, Esq.

cc:

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MSBDFA Management Group, Inc.

Pre-MUR 377

DECLARATION OF STANLEY W. TUCKER.

- 1. I am the President of MSBDFA Management Group, Inc. ("MMG"), a Maryland corporation which has initiated the above-referenced self-referral to the Federal Election Commission. I am submitting this Declaration to supplement the information provided to the Commission in the letter submitted to Lois Letner, Psq. on April 7, 1999, by Joseph E. Sandler as counsel for the company.
- 2. Attached to this Declaration as Exhibit 1 is a chart indicating the sources of funds used by four officers of MMG to make certain contributions to candidates for federal office. Those officers included myself; Timothy L. Smoot, senior vice president for finance; Catherine D. Lockhart, executive vice president; and R. Randy Croxton, senior vice president, investments.
- 3. The information set forth on this chart is true and correct to the best of MMG's current information, knowledge and belief.
- 4. The chart reflects that I made a contribution in the amount of \$225 to the campaign of Rep. Elijah Cummings (D-Md.) on or about May 15, 1996 and that I made a

contribution in the amount of \$250 to the campaign of Rep. Albert Wynn (D-Md.) on or about June 25, 1997. These contributions were made with my personal funds and were not reimbursed by MMG or by any other person or entity.

I declare under penalty of perjury that the foregoing is true and correct to the best of my present knowledge, information and belief.

Executed this 27th day of September, 1999.

Stanley W. Tacker

EXHIBIT 1 TO DECLARATION OF STANLEY W. TUCKER

FEC RECO	ORDS	Intermediate source of funds	MMG Inc. Check. Info		
Donor	Date	Committee	Amount		
Lockhart	11/13/97	Wynn	\$250	None	#1898 \$250 10/14/97
Lockhart	5/7/98	Mikulski	\$250	None	#2333 \$250 4/21/98
Smoot	8/11/97	Cummings	\$500	Reimbursed by company— still searching for documentation	
Smoot	11/13/97	Wynn	\$500	Croxton \$250 MMG#1901 10/14/97	#1899 \$250 10/14/97
Smoot	2/13/98	Cummings	\$500	Croxton \$250 MMG#2164 2/3/98	#2166 \$250 2/3/98
Smoot	5/7/98	Mikulski	\$250	None	#2334 \$250 4/21/98
Tucker	5/15/96	Cummings	\$225	Used personal funds—not reimbursed by company	
Tucker	9/18/96	Wynn	\$1,000	Reimbursed by company— still searching for documentation	
Tucker	10/15/96	Cummings	\$250	Reimbursed by company— still searching for documentation	
Tucker	6/25/97	Wynn	\$250	Used personal funds—not reimbursed by company	
Tucker	8/11/97	Cummings	\$1,000	Reimbursed by company— still searching for documentation	
Tucker	11/13/97	Wynn	\$250	None	#1900 \$250 10/14/97
Tucker	2/13/98	Cummings	\$500	\$250 Lockhart	#2167 \$250

}				MMG#2165 2/3/98	2/3/98
Tucker	4/7/98	Cardin	\$200	Croxton \$50 MMG # 2253 3/24/98	#2256 \$50 3/24/98
				Smoot \$50 MMG # 2254 3/24/98	
				Lockhart \$50 #2255 3/24/98	
Tucker	5/7/98	Mikulski	\$500	Croxton \$250 MMG#2332 4/21/98	#2331 \$250 4/21/98
Tucker	5/21/98	Moseley- Braun	\$500	Smoot \$250 MMG#2358 5/4/98	#2356 \$250 5/4/98
Tucker	8/13/98	Jefferson	\$500	Croxton \$250 MMG#2355 5/4/98 Lockhart \$250 MMG#2357 5/4/98	